

Judge: Timothy W. Dore
Chapter: 13
Hearing Date: September 16, 2020
Hearing Location:
Judge Dore's Courtroom
Telephonic
Time: 9:30 p.m.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

In re:

BRADLEY EVAN DRUMMOND &
ANGELA MARIE DRUMMOND,

Debtors.

CHAPTER 13 PROCEEDING
NO. 20-10818-TWD

DEBTORS' RESPONSE TO CREDITOR'S
MOTION FOR RELIEF FROM STAY

Debtors, Bradley Evan Drummond and Angela Marie Drummond, by and through their attorney, Jonathan Smith, hereby replies to the SN Servicing Corporation's Motion for Relief from Stay. In support thereof, Debtor states the following:

1. Debtors received a Motion for Relief from Stay on August 24, 2020.
2. Debtors filed a Chapter 7 case, case number 09-19964 on September 25, 2009.
3. Debtors received a discharge in their Chapter 7 case on December 30, 2009.
4. The debtors filed this current Chapter 13 case on March 13, 2020.
5. The second mortgage has remained silent in regards to their debt for the past ten years.

Debtor's Response to Motion for Relief of
Stay - 1

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1 6. The debtors will reopen their Chapter 7 bankruptcy and file an adversary proceeding to
2 avoid the second mortgage.

3 WHEREFORE, Debtors respectfully requests the Court to deny the creditor's Motion for Relief of
4 Stay.
5

6 DATED, this 9th day of September, 2020.
7

8 /s/ Jonathan Smith
9 Jonathan Smith, WSBA #27372
10 Attorney for Debtor
11 12207 NE 8th Street
12 Bellevue, WA 98005
13 Tel: 425-452-9797
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26 Debtor's Response to Motion for Relief of
27 Stay - 2
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